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18 HAMAMATSU CORPORATION,

HAMAMATSU PHOTONICS K.K., and

19 PHOTONICS MANAGEMENT CORP.

20 **UNITED STATES DISTRICT COURT**

21 **NORTHERN DISTRICT OF CALIFORNIA**

22 SEMICAPS PTE LTD.,

23 Plaintiff,

24 vs.

25 HAMAMATSU CORPORATION, et al.,

26 Defendants.

CASE NO. 17-cv-03440-DMR

**DEFENDANTS' REVISED UNOPPOSED  
MOTION FOR ISSUANCE OF LETTER  
OF REQUEST FOR INTERNATIONAL  
JUDICIAL ASSISTANCE**

Date: Thursday, May 14, 2020

Time: 1:00 p.m.

Courtroom: 4

Judge: Honorable Donna M. Ryu

**NOTICE OF MOTION AND MOTION**

TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that on Thursday, May 14, 2020, at 1:00 p.m., or such other time as ordered by the Court, located at 1301 Clay Street, Oakland, CA 94612, Defendants Hamamatsu Corporation, Hamamatsu Photonics K.K., and Photonics Management Corp. (collectively, “Hamamatsu”) will respectfully move to request that this Court sign and issue the attached Letter of Request for International Judicial Assistance pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters (“Letter of Request”), attached hereto as Exhibit 1, in order to request the deposition and documents of Dr. Alfred Cheng Teck Quah, Ph.D.

Dr. Quah is a named inventor of U.S. Patent No. 7,623,982 (the “’982 patent”), entitled “Method of Testing an Electronic Circuit and Apparatus Thereof,” and possesses information that is highly relevant to this lawsuit. Dr. Quah is a resident of Singapore and under the jurisdiction of the Singapore courts, including the Supreme Court of Singapore. The evidence requested cannot be obtained without the aid of the Supreme Court of Singapore. Hamamatsu respectfully requests that the Court execute the attached Letter of Request at its earliest convenience.

Plaintiff SEMICAPS Pte Ltd. (“SEMICAPS”) has confirmed that it does not oppose this request for issuance of a Letter of Request for International Judicial Assistance.

Hamamatsu originally filed this unopposed request for issuance of a Letter of Request for International Judicial Assistance on March 19, 2020. As the motion appeared dependent on the existence of a protective order, the Court ordered the parties to submit a proposed protective order or a statement explaining why a protective order is not necessary at this time. The Court entered the parties’ stipulated protective order (Dkt. No. 91) on March 26, 2020. As directed by the Court in its April 8, 2020 Order, Hamamatsu is respectfully submitting this revised motion for Issuance of Letter of Request for International Judicial Assistance incorporating the protective order entered by the Court.

1 Dated: April 8, 2020

QUINN EMANUEL URQUHART & SULLIVAN,  
LLP

2  
3 By: /s/ David Eiseman

David Eiseman

4 Attorneys for Defendants  
5 HAMAMATSU CORPORATION,  
6 HAMAMATSU PHOTONICS K.K., and  
7 PHOTONICS MANAGEMENT CORP.  
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**CERTIFICATE OF SERVICE**

I, Joseph LeRoy, certify that pursuant to Local Rule 5-5, counsel of record who have consented to electronic service are being served on April 8, 2020 with copies of the attached document(s) via the Court's CM/ECF system, which will send notification of such filing to counsel of record.

Executed on April 8, 2020, at San Francisco, California.

/s/ Joseph LeRoy